

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 2:20-CR-62(1)
	:	
vs.	:	
	:	JUDGE MORRISON
STEVEN G. ROSSER,	:	
	:	
Defendant.	:	

**MOTION TO ALLOW DEFENDANT TO TRAVEL OUTSIDE OF THE
SOUTHERN DISTRICT OF OHIO**

Now comes Defendant, by and through counsel, and respectfully requests that the court allow him to travel outside of the Southern District of Ohio. Reasons for this motion are explained in the below Memorandum in Support.

Respectfully submitted,

_____/s/ Robert F. Krapenc
ROBERT F. KRAPENC (0040645)
150 East Mound Street
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Columbus, Ohio 43215
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Attorney for Defendant

MEMORANDUM IN SUPPORT

Defendant Steven G. Rosser is currently on pre-trial supervision, with a jury trial scheduled for August 23, 2021. Mr. Rosser has been compliant with the terms of pre-trial release since the inception of this case in March, 2020.

Defendant's grandparents, who are both more than 80 years old, reside in the state of Tennessee. This Court has twice granted permission for Defendant to visit with them during the pendency of this case. At this time, Defendant's grandmother's health has declined significantly, and Counsel is informed that her passing is imminent. Therefore, Defendant requests permission to visit them at their residence, 2144 Cumberland City Road, Dover, Tennessee, from June 18, 2021, through June 21, 2021. Assistant U. S. Attorney Kevin Kelley has no objection to this motion.

Respectfully Submitted,

_____/s/ Robert F. Krapenc_____
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Suite 310
Columbus, Ohio 43215
Phone: (614) 221-5252
Fax: (614) 224-7101
Bob@Krapenclaw.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION has been delivered via electronic mail service to Counsel for all parties of record, this 16th day of June, 2021.

_____/s/ Robert F. Krapenc_____
ROBERT F. KRAPENC (0040645)
Attorney for Defendant